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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL CISLO,

Defendant.

_____ /

Case:2:22-cr-20306

Judge: Michelson, Laurie J.

MJ: Stafford, Elizabeth A.

Filed: 06-15-2022 At 03:33 PM

USA V SEALED MATTER (LG)

Violations:

18 U.S.C. § 1343

18 U.S.C. § 1028A

18 U.S.C. § 1344

18 U.S.C. § 471

Forfeiture Allegations

INDICTMENT

THE GRAND JURY CHARGES:

COUNTS ONE THROUGH FOUR
(18 U.S.C. § 1343 – WIRE FRAUD)

On or about June 2018 through October 2018, the defendant MICHAEL CISLO, with the intent to defraud, knowingly devised and executed a scheme to defraud and to obtain money and property by means of materially false and fraudulent pretenses and representations. The purpose of the scheme to defraud was for the defendant to obtain money and property to which the defendant was not entitled by counterfeiting checks to be drawn on accounts belonging to other individuals and entities, and depositing the counterfeit checks into accounts that the defendant had access to. For the purpose of executing this scheme to defraud, the defendant fraudulently endorsed counterfeit checks using the names and

signatures of other actual persons. For the purpose of executing this scheme to defraud, the defendant electronically deposited counterfeit checks into bank accounts that the defendant had access to, including bank accounts that the defendant fraudulently opened using the name, date of birth, and social security number of another actual person. On or about each of the dates set forth below, in the Eastern District of Michigan and elsewhere, the defendant MICHAEL CISLO, for the purpose of executing this scheme, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below for each count, each transmission constituting a separate count, all in violation of Section 1343 of Title 18 of the United States Code.

<u>Count</u>	<u>Date of Transmission</u>	<u>Nature of Transmission</u>	<u>Victim</u>	<u>Amount of Transaction</u>
1	June 22, 2018	Electronic deposit of counterfeit business check into a Citizens Bank account, to be drawn on a Fidelity Investments business account	M.E.	\$1,010.10
2	June 24, 2018	Electronic deposit of counterfeit business check into a Citizens Bank account to be drawn on a Fidelity Investments business account	M.E.	\$1,500.00
3	September 20, 2018	Electronic deposit of counterfeit personal check into a JP Morgan Chase Bank personal	C.S.	\$750.00

		account that the defendant fraudulently opened		
4	September 29, 2018	Electronic deposit of counterfeit business check into a TCF Bank account that the defendant fraudulently opened	C.S.	\$1,483.39

COUNTS FIVE THROUGH EIGHT
(18 U.S.C. § 1028A – AGGRAVATED IDENTITY THEFT)

On or about the dates listed below, in the Eastern District of Michigan, the defendant MICHAEL CISLO, did knowingly use, without lawful authority, as noted below, a means of identification of another person, specifically, the name and signature of an individual whose initials were “M.E.,” and the name, signature, date of birth, and social security number of an individual whose initials were “C.S.,” during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), specifically, wire fraud, in violation of 18 U.S.C. § 1343, as set forth in Counts One through Four, above, knowing that the means of identification belonged to another actual person described below for each count, each use constituting a separate count, all in violation of Sections 1028A(a)(1) and 2 of Title 18 of the United States Code.

<u>Count</u>	<u>Date of Use</u>	<u>Nature of Use</u>	<u>Victim</u>
5	June 22, 2018	Electronic deposit of counterfeit business check into a Citizens Bank account, to be drawn on a Fidelity Investments business account	M.E.
6	June 24, 2018	Electronic deposit of counterfeit business check into a Citizens Bank account to be drawn on a Fidelity Investments business account	M.E.
7	September 20, 2018	Electronic deposit of counterfeit personal check into a JP Morgan Chase Bank personal account that the defendant fraudulently opened	C.S.
8	September 29, 2018	Electronic deposit of counterfeit business check into a TCF Bank account that the defendant fraudulently opened	C.S.

COUNT NINE
(18 U.S.C. § 1344 – BANK FRAUD)

On or about July 17, 2018, at a Monroe Bank & Trust branch at 1204 North Monroe Street, Monroe, Michigan, in the Eastern District of Michigan, the defendant MICHAEL CISLO did, with the intent to defraud and in order to execute a scheme to defraud and to obtain money in the care, custody and control of Monroe Bank & Trust, a federally insured financial institution, by means of material false and fraudulent pretenses and representations, present to a drive-up teller at Monroe Bank & Trust a counterfeit business check, to be drawn on a

Fidelity Investments business account belonging to an individual whose initials were "M.E." for the purpose of obtaining \$1,122.55 from the account, all in violation of Section 1344 of Title 18 of the United States Code.

COUNT TEN
(18 U.S.C. § 1028A – AGGRAVATED IDENTITY THEFT)

On or about July 17, 2018, in the Eastern District of Michigan, the defendant MICHAEL CISLO did knowingly use, without lawful authority, a means of identification of another person, specifically, the name and signature of an individual whose initials were "M.E." during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c)(5), specifically, bank fraud, in violation of 18 U.S.C. § 1344, as set forth in Count Nine, above, knowing that the means of identification belonged to another actual person, all in violation of Sections 1028A(a)(1) and 2 of Title 18 of the United States Code.

COUNT ELEVEN
(18 U.S.C. § 1344 – BANK FRAUD)

On or about July 20, 2018, at a Fifth Third Bank branch at 7041 Schaefer Road, Dearborn, Michigan, in the Eastern District of Michigan, the defendant MICHAEL CISLO did, with the intent to defraud and in order to execute a scheme to defraud and to obtain money in the care, custody and control of Fifth Third Bank, a federally insured financial institution, by means of material false and fraudulent pretenses and representations, present to a teller at Fifth Third Bank a counterfeit

business check, drawn on a Fidelity Investments business account belonging to an individual whose initials were "M.E." for the purpose of obtaining \$1,453.44 from the account, all in violation of Section 1344 of Title 18 of the United States Code.

COUNT TWELVE
(18 U.S.C. § 1028A – AGGRAVATED IDENTITY THEFT)

On or about July 20, 2018, in the Eastern District of Michigan, the defendant MICHAEL CISLO did knowingly use, without lawful authority, a means of identification of another person, specifically, the name and signature of an individual whose initials were "M.E." during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c)(5), specifically, bank fraud, in violation of 18 U.S.C. § 1344, as set forth in Count Eleven, above, knowing that the means of identification belonged to another actual person, all in violation of Sections 1028A(a)(1) and 2 of Title 18 of the United States Code.

COUNT THIRTEEN THROUGH TWENTY
**(18 U.S.C. § 471 – COUNTERFEITING AND FORGING OBLIGATIONS
OR SECURITIES OF THE UNITED STATES)**

On or about September 2018 through October 24, 2018, in the Eastern District of Michigan, the defendant, MICHAEL CISLO, with intent to defraud, attempted to and did counterfeit (falsely make, forge, alter, and any applicable combination) obligations of the United States, that is, falsely made, forged and counterfeited the Federal Reserve Notes listed below, each Note constituting a separate count, all in violation of Title 18, United States Code, Section 471.

<u>Count</u>	<u>Quantity</u>	<u>Denomination</u>	<u>Series</u>	<u>Serial No.</u>
13	One (1)	Five-dollar Federal Reserve Note	Series of 2013	MA41915785B
14	One (1)	Ten-dollar Federal Reserve Note	Series of 2013	MD38009491A
15	One (1)	Twenty-dollar Federal Reserve Note	Series of 2013	ML28269116I
16	One (1)	Fifty-dollar Federal Reserve Note	Series of 2006	EE79374572T
17	Six (6)	One-hundred-dollar Federal Reserve Notes		B17696366
18	Three (3)	One-hundred-dollar Federal Reserve Notes	Series of 2009A	LB34190253F
19	Three (3)	One-hundred-dollar Federal Reserve Notes	Series of 2009A	LJ13246492B
20	Two (2)	One-hundred-dollar Federal Reserve Notes	Series of 2006	HL62546314G

FORFEITURE ALLEGATIONS

The allegations set forth in Counts One through Twenty of this Indictment are hereby incorporated by reference for purposes of alleging forfeiture pursuant to

the provisions of Title 18, United States Code, Section 981(a)(1)(C) together with Title 28, United States Code, Section 2461(c).

As a result of the forgoing violations of Title 18, United States Code, Sections 1341 and 1343, the Defendant shall forfeit to the United States any property, real or personal, which constitutes, or is derived from, any proceeds obtained, directly or indirectly, as a result of such violation(s), pursuant to Title 18, United States Code, Section 981(a)(1)(C) together with Title 28, United States Code, Section 2461(c).

If the property described above as being subject to forfeiture, as a result of any act or omission of the Defendant:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

Upon conviction of the violations alleged in Counts One through Twenty of this Indictment, the United States will seek a forfeiture money judgment against

the Defendant in an amount equal to the total amount of proceeds he obtained as a result of his violations of Title 18, United States Code, Sections 1341 and 1343 as alleged in this Indictment.

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

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United States Attorney

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Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: Pak

Case Title: USA v. MICHAEL CISLO

County where offense occurred : Wayne and Monroe

Check One: ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

✓ Indictment/ Information --- **no** prior complaint.
 Indictment/ Information --- based upon prior complaint [Case number:]
 Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ **Judge:** _____

- ☐ Corrects errors; no additional charges or defendants.
- ☐ Involves, for plea purposes, different charges or adds counts.
- ☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

June 15, 2022
Date

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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.